

United States District Court

for the
Western District of New York

United States of America

v.

Case No. 25-MJ-1260

BRAYDEN STOREY

Defendant

CRIMINAL COMPLAINT

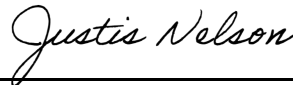
I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

Between on or about September 2022, through on or about April 2024, in the Western District of New York, and elsewhere, the defendant, **BRAYDEN STOREY**, using facilities and means of interstate and foreign commerce, that is, a cellular telephone and the internet, did knowingly persuade, induce, entice, and coerce, and attempt to persuade, induce, entice, and coerce, Minor Victim 1, an individual who has not attained the age of 18 years, to engage in sexual activity for which any person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2422(b).

This Criminal Complaint is based on these facts:

☒ Continued on the attached sheet.



Complainant's signature

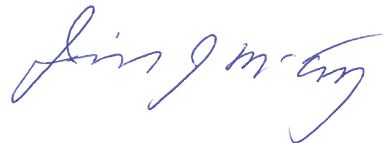
JUSTIS W. NELSON
SPECIAL AGENT
FEDERAL BUREAU OF INVESTIGATION

Printed name and title

Sworn to before me telephonically.

Date: March 17, 2025

City and State: Buffalo, New York



Judge's signature

HON. JEREMIAH J. MCCARTHY
UNITED STATES MAGISTRATE JUDGE

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

STATE OF NEW YORK)
COUNTY OF ERIE) SS:
CITY OF BUFFALO)

I, **JUSTIS W. NELSON**, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent of the Federal Bureau of Investigation (“FBI”) and entered on duty in September 2022. I am currently assigned to the Buffalo Field Office Child Exploitation and Human Trafficking Task Force (“CEHTTF”), which targets individuals involved in the sexual exploitation of children and adults, as well as human trafficking offenders. As such, I am a law enforcement officer of the United States, within the meaning of Title 18, United States Code, Section 115(c)(1), who is “authorized by law or by Government agency to engage in or supervise the prevention, detention, investigation or prosecution of any violation of Federal criminal law.” As a Special Agent assigned to the CEHTTF, I have participated in investigations of persons suspected of violating federal child exploitation, child pornography, and human trafficking laws, including the drafting and execution of search and arrest warrants. I have participated in multiple investigations in which criminals used computer, cellular telephone, and other mobile communication technology to victimize children and adults, as well as communicate with their associates and undercover officers. I work with experienced FBI Special Agents and Task Force Officers, and I have consulted with numerous law enforcement officers experienced in child exploitation investigations. I have also participated in FBI mandated and voluntary training for these matters.

2. I make this affidavit in support of a criminal complaint charging **BRAYDEN STOREY** (hereinafter “**STOREY**”), date of birth XX/XX/2003, with violation of Title 18, United States Code, Section 2422(b) [Coercion and Enticement of a Minor].

3. The statements contained in this affidavit are based on my involvement in this investigation, as well as information provided to me by other law enforcement personnel, my training and experience, and the review of documents and records. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts necessary to establish probable cause to believe that **STOREY** violated Title 18, United States Code, Section 2422(b) [Coercion and Enticement of a Minor]. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

PROBABLE CAUSE

Initial Report & Investigation

4. On or about June 13, 2024, the minor victim, date of birth XX/XX/2009 (hereinafter, “Minor Victim 1”), reported to West Seneca Police Department (“WSPD”) an incident involving an individual that she met online. At times relevant to the below described incident, Minor Victim 1 resided in the Western District of New York. Minor Victim 1 reported that the **STOREY** first contacted her through the social media application

Instagram¹ on or about September 2022. **STOREY** initially used the Instagram account “The.world.has.turned” and later created another account to communicate with Minor Victim 1. **STOREY** also communicated with Minor Victim 1 through the social media platform Discord² and text message. Between on or about September 2022 through on or about September 2023, **STOREY** and Minor Victim 1 would talk about video games and anime shows. At times, **STOREY** made sexual comments to Minor Victim 1. Beginning in and around October 2023, the sexual communications that **STOREY** sent to Minor Victim 1 significantly increased.

5. In on or about October 2023, **STOREY** repeatedly asked Minor Victim 1 to send him sexually explicit images. According to the WSPD report, during this period, **STOREY** sent Minor Victim 1 a nude image of himself and stated, “You have to send one back or it will make me feel like shit.” In response, Minor Victim 1 sent **STOREY** a nude image. From on or about October 2023, through and including March 2024, **STOREY** and Minor Victim 1 exchanged sexually explicit images using an undisclosed platform.

6. On or about March 2024, Minor Victim 1 decided to block **STOREY** on all social media applications. As a result, **STOREY** created another Instagram account to

¹ Based on my training and experience as well as review of publicly available information, I know that Instagram is a free, internet-based photo and video sharing app available on iPhone and Android. People can upload photos or videos to the service and share them with their followers or with a select group of friends. They can also view, comment and like posts shared by their friends on Instagram.

² Based on my training and experience as well as review of publicly available information, I know that Discord is an internet-based multimedia messaging application that provides chat and messaging functions to its users, as well as servers and channels that allow users to share messages, files, and other content through messaging and voice channels.

contact Minor Victim 1. On or about April 2024, **STOREY** called Minor Victim 1 approximately 50 times in a two-day span. Minor Victim 1 did not answer these calls and blocked **STOREY**'s phone number so that he could not contact her.

7. On or about May 9, 2024, Minor Victim 1 received a four-page letter in the mail at her residence. In this letter, **STOREY** writes about his suicidal ideations and his desire to be in a relationship with Minor Victim 1 regardless of their age difference. The front of the envelope states the letter is from **STOREY** at an address based upon investigation to be known to be associated with him. **STOREY** also signed the letter using the moniker "flop". Along with the letter, **STOREY** provided a lock of his hair.

8. On or about June 13, 2024, Minor Victim 1 provided WSPD with **STOREY**'s information, including his telephone number (479) XXX-6214, his Instagram account "The.world.has.turncd", his Discord account information, and his email address psychomanbs81@gmail.com.

9. On or about June 17, 2024, WSPD conducted a check of law enforcement databases and identified telephone number (479) XXX-6214 as registered to **STOREY**.

10. On or about August 12, 2024, the FBI served an administrative subpoena to Google LLC for information related to email address psychomanbs81@gmail.com between the dates of September 1, 2022 and August 12, 2024. On or about August 12, 2024, Google LLC responded with the following information:

Login IP Addresses: 167.224.175.105 and 167.224.217.121

Registered Telephone: 479-XXX-6214

Google LLC also provided information about two Android devices associated with psychomanbs81@gmail.com. These devices were also associated with two additional email addresses during this period, psychobray81@gmail.com and braydenstorey81@gmail.com:

Device 1

IMEI³: 352157108550759

Brand: Motorola

Model: Moto Z4

Device 2

IMEI: 359689221749010

Brand: Motorola

Model: Motorola Edge 5G UW (2021)

11. On or about August 20, 2024, the FBI served an administrative subpoena to Meta Platforms, Inc. for information related to Instagram account “The.world.has.turne” between the dates of September 1, 2022, and August 20, 2024. On or about August 20, 2024, Meta Platforms, Inc. responded with the following:

Login IP Addresses: 167.224.175.105 on 04/02/2024, 17:08:09 UTC

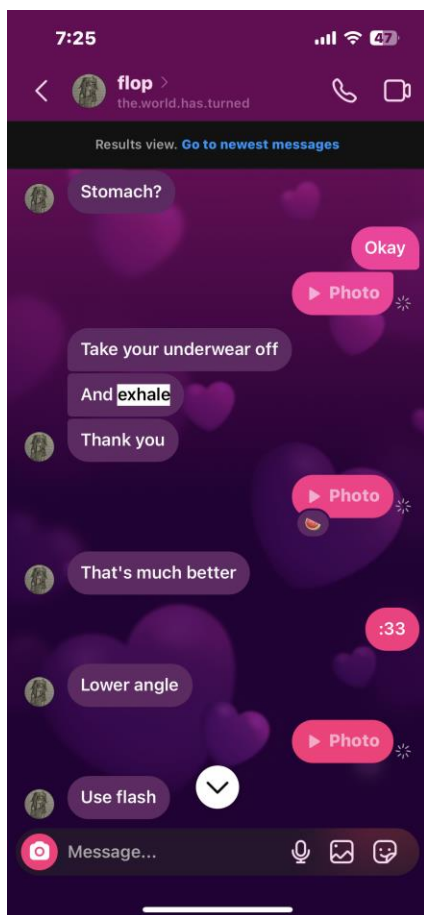
167.224.217.121 on 03/21/2024, 22:48:33 UTC

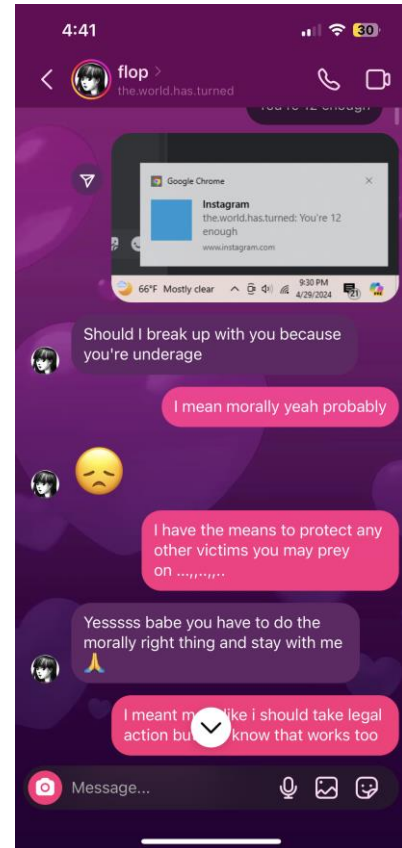
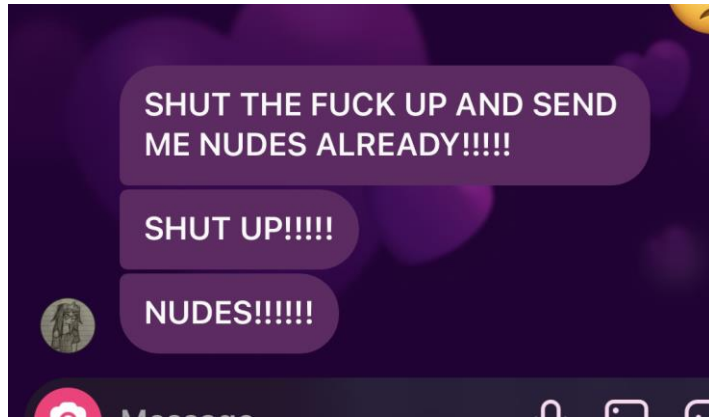
Registered Email: Psychomanbs81@gmail.com

³ An International Mobile Equipment Identity (IMEI) number is a unique 15-digit mobile device identifier.

12. As identified in paragraphs 10 and 11, the login IP addresses for **STOREY's** email address psychomanbs81@gmail.com and **STOREY's** Instagram account "The.world.has.turned" are the same. Based on my training and experience, I understand this to mean that the device(s) used to login to **STOREY's** email and Instagram accounts were connected to and accessed from the same Internet router.

13. On or about July 1, 2024, Minor Victim 1 provided WSPD with images of **STOREY**, his penis, and communications sent by **STOREY** via the Instagram account "The.world.has.turned" and text message. Depicted below are representative examples of some, but not all of these images. In the images from communications with the Instagram account "The.world.has.turned" depicted below, **STOREY's** vanity name is also flop:





Interview of Minor Victim 1 & Additional Information

14. On or about July 31, 2024, an FBI Child Adolescent Forensic Interviewer interviewed Minor Victim 1. In summary, Minor Victim 1 began talking to **STOREY** when she was 13 years old and he was 19 years old. **STOREY** and Minor Victim 1 would video call each other on Discord. The majority of sexually explicit communications occurred between **STOREY** and Minor Victim 1 via Instagram. In multiple communications, Minor Victim 1 reminded **STOREY** that she was 14 years old, and **STOREY** appeared to disregard her age.

15. Through Instagram, **STOREY** sent multiple videos and images of himself masturbating to Minor Victim 1. **STOREY** would then request that Minor Victim 1 take pictures of her vagina and breasts and send them to him, which she did at his request. Minor Victim 1 stated that **STOREY** would constantly take screenshots of their Instagram communications. Minor Victim 1 believes that **STOREY** has approximately 7,000 to 10,000 screenshots of her saved on his electronic devices. Minor Victim 1 knows that **STOREY** has two Android phones, one of which can only be used with a Wi-Fi connection. **STOREY** told Minor Victim 1 that he moved images of her from his phone onto his flash drive or hard drive.

16. On or about July 30, 2024, a consensual search of Minor Victim 1's cell phone was conducted. During the search, nude images of **STOREY** and child sexual abuse material⁴

⁴ In this affidavit, I intend the term "child sexual abuse material," or "CSAM," to have the same meaning as the term "child pornography," as the latter term is defined in Title 18, United States Code, Section 2256(8). I use the term "CSAM" interchangeably with the term "child pornography." Thus, my conclusion that a particular image or video qualifies as "CSAM" necessarily means that I believe that the image qualifies as "child pornography," as that term is defined under federal law.

of the Minor Victim 1 were both located. During the July 31, 2024, child forensic interview of Minor Victim 1, she identified Instagram communications exchanged between her and **STOREY**, images of **STOREY**, and CSAM that she produced at **STOREY**'s request.⁵ Below is a description of some, but not all of the CSAM images that she produced for **STOREY** at his request:

FILE	DESCRIPTION
5005_1.jpg	An image depicting Minor Victim 1 taking a picture of herself in a mirror wearing a bra with her vagina exposed.
4697.jpg	An image depicting Minor Victim 1 sitting on the ground with her legs spread apart exposing her vagina.

17. In approximately April 2024, Minor Victim 1 attempted to end her relationship with **STOREY**; however, he insisted that they stay together. She wanted to end their relationship was because she was uncomfortable with its sexual nature. Eventually, they broke up and Minor Victim 1 blocked his telephone number and his Instagram accounts.

CONCLUSION

18. Based upon the foregoing, I respectfully submit that there is probable cause to believe that **BRAYDEN STOREY** knowingly violated Title 18, United States Code, Section 2422(b) [Coercion and Enticement of a Minor]. It is respectfully requested that this Court issue the requested criminal complaint and arrest warrant.

⁵ On September 6, 2024, Magistrate Judge H. Kenneth Schroeder, Jr., Western District of New York authorized a search warrant for information associated with the **STOREY**'s Instagram account "The.world.has.turne" that is stored at premises controlled by Meta Platforms, Inc. See 24-MJ-96 (under seal). On or about November 11, 2024, Meta Platforms, Inc. responded to the search warrant. Your affiant reviewed the files within the response and identified multiple images of **STOREY** that resembled images of the **STOREY** provided by Minor Victim 1; however, no evidence of child sexual abuse material was located.

19. To minimize the risk that **BRAYDEN STOREY** will learn about the complaint and arrest warrant before it can be executed, and thereby take steps to evade capture, I respectfully request that the Court issue an order sealing the criminal complaint, this affidavit, and the requested arrest warrant until such time as **BRAYDEN STOREY** is arrested.

Justis Nelson

JUSTIS W. NELSON
Special Agent
Federal Bureau of Investigation

Sworn to and subscribed telephonically
this 17th day of March. 2025.

Jeremiah J. McCarthy

HONORABLE JEREMIAH J. MCCARTHY
UNITED STATES MAGISTRATE JUDGE